

IESBA  
Attn. Mr. Ken Siong

Submitted via email to kensiong@ethicsboard.org

P.O. Box 7984  
1008 AD Amsterdam  
Antonio Vivaldistraat 2-8  
1083 HP Amsterdam  
T +31 20 301 03 01  
nba@nba.nl  
www.nba.nl

Date	Re	Our ref	Attachment	Direct dial nr
30 April 2015	ED Proposed Changes to Part C of the Code Addressing Presentation of Information and Pressure to Breach the Fundamental Principles	JTD	0	020-3010399

Dear Mr. Siong,

The NBA welcomes the opportunity to comment on the Exposure Draft (ED) mentioned above.

As you are aware, the NBA has implemented ethical regulations that make no distinction between professional accountants in business (PAIBs) and professional accountants in public practice. We refer to our response to the Consultation Paper "Improving the Structure of the Code of Ethics". In that response we also recommend to transfer the contents of the current Part C into application and other explanatory material separate from the Code.

Having said that, as the Code may continue to contain a Part C, and as a member of the Federation of European Accountants (FEE), we confirm that we agree with the comments FEE provided to you in its response to this ED and we particularly emphasize the significance of the general comments FEE made. We wish, however, to make a few comments in addition.

Nederlandse  
Beroepsorganisatie  
van Accountants

The logo for the Nederlandse Beroepsorganisatie van Accountants (NBA) features a solid orange horizontal bar above the letters "NBA" in a bold, orange, sans-serif font.

#### Proposed Section 320

1. Paragraph 320.5 requires "reasonable steps". We believe it must be made explicit that what "reasonable steps" are, will differ on a case to case basis. It depends on factors such as what is workable, what is effective, what would an objective and reasonable third party expect the professional accountant to do? We believe it is essential that the professional accountant (in any role played by him or her) and the users of the accountant's work be provided with guidance on how "reasonable steps" is to be interpreted, in order to prevent expectation gaps to occur.
2. Paragraph 320.2 addresses the professional accountant who is responsible for recording, maintaining, preparing of presenting information. This paragraph includes the following sentence:

*"This responsibility involves taking reasonable steps to represent the facts accurately and completely in all material respects; [.....]."*

We believe that the requirement to take reasonable steps does not emerge from the fact the professional accountant is responsible for recording and so on, but is based on the requirement to apply the conceptual framework in order to comply with the fundamental principles. This also means that this requirement is not specific to a PAIB, but to all professional accountants – it should hence directly follow from Part A and not be presented as a new or specific requirement in part C.

Proposed Section 370

3. We believe that the pressures which are the subject matter of Part C are not limited to PAIBs but would similarly apply to accountants in public practice. For that reason, IESBA may reconsider the place of this section (a good example of the Dutch approach to have no longer a distinction between Parts A, B and C of the Code).
4. Regarding Question 5: "*Are the references to other sections of Part C of the Code, in paragraph 370.9, helpful?*" These references are helpful. However this reference brings along the risk that one will focus on one specific section, although Part A should always be taken into account, and more than just one section might be relevant in a specific situation. The paragraph should make this clear.

For further information on this letter, please contact Jan Thijs Drupsteen via email at [j.th.drupsteen@nba.nl](mailto:j.th.drupsteen@nba.nl).

Yours sincerely

Royal NBA  
Dutch Ethics & Assurance Standards Board



Prof. dr. Peter W.A. Eimers RA  
Chairman

Nederlandse  
Beroepsorganisatie  
van Accountants

